



Andrew Fanara  
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US EPA  
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Washington, DC 20460

October 28, 2002

Dear Mr. Fanara:

NEMA COMMENTS ON ENERGY STAR PROGRAM REQUIREMENTS FOR EXIT  
SIGNS DRAFT 1—ELIGIBILITY CRITERIA—VERSION 3.0

NEMA appreciates the opportunity to comment on this draft criteria document. NEMA is the leading trade association in the United States representing the interests of electroindustry manufacturers. Founded in 1926 and headquartered near Washington, D.C., our 450 member companies manufacture products used in the generation, transmission and distribution, control, and end-use of electricity, including illuminated exit signs. Annual shipments of these products total \$100 billion.

NEMA supports the Energy Star™ program and we advocated incorporation of version 2 specifications as mandated standards in the energy bill being considered in Congress. We understand that when these standards become effective requirements (projected for January 1, 2005), Energy Star™ will need to go beyond these values. We look forward to working with you on development of the version 3 specifications.

Our comments are keyed to the specific sections in the proposed draft.

- 1) A. Exit sign definition. *Add the following to the end of the definition:* “A photoluminescent exit sign that does not contain an integral light source does not meet the eligibility requirements.” *The device must be standalone to be comparable to other qualifying devices.*
- 3) A. Luminance Depreciation. *Delete the wording beginning with A statement shall be included such as,... down to the end of the paragraph. Replace this wording with the following:* The following statement shall be included with the product materials: “The light source in this sign will depreciate, which can lead to a light output level that is below current building code requirements. The light source (lamps) should be replaced at regular intervals, and when they are no longer functioning, to assure safety and visibility in the event of an emergency”. *The statement should be uniform for all manufacturers.*

Table 1 Input power demand. *Replace “3 watts or less per sign” with “5 watts or less per sign”. This is a 50% power reduction and should be sufficient to differentiate products.*

Table 1 Power factor. *The wording is confusing. We believe the intent is to state: “A leading power factor is satisfactory. A lagging power factor not less than 0.7 is satisfactory.”*

Table 1 Average luminance. As a matter of public safety, we strongly support the luminance requirement in addition to UL 924 listing.

- 4) A. Listing under Standard UL 924 *The following needs to be added to the citation for the standard at the end of the first sentence in the second line: “8<sup>TH</sup> Edition, dated March 29, 1995, with revisions through and including July 11, 2002”. This change would make the applicable version of the standard clear.*

The note following the above refers to the needed new Qualified Product Information form. It would be helpful if EPA would provide a proposed new form for comment, as then we would be in a better position to understand precisely what the data requirements would be.

- 5) Effective Date. *The proposed effective date of “on January 1, 2003” should be replaced with “one year after publication of the final specification”. This effective date also needs to be changed in 5) A. Qualifying and Labeling under the Version 3.0 Specification and in the note following about the website. We are willing to agree to a no grandfathering provision with this change. As it is worded now, the standard would not be known until just before the requirement was effective, which is not possible to implement in the manufacturing and distribution channels.*

Again, we appreciate the opportunity to comment and look forward to working with you on development of the specifications.

Sincerely yours,



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